

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:12-CR-224
)	
GILBERTO RAMOS,)	The Honorable Gerald Bruce Lee
)	
Defendant)	

GOVERNMENT'S REPLY TO DEFENDANT'S SECOND MOTION
TO CONTINUE TRIAL DATE

For the following reasons, the Government objects to a further continuance of the trial in this matter.

On May 24, 2012, a grand jury returned an indictment charging the defendant with conspiracy to distribute five kilograms or more of cocaine. On August 30, 2012, a grand jury returned a superseding indictment charging the defendant, Maurice Krider, and Carlos Torres with conspiracy to distribute five kilograms or more of cocaine. This Court set the case for trial by jury on November 19, 2012. The Government was prepared to try the defendant on November 19, 2012. On November 5, 2012, the defendant moved to continue the trial date. Given the circumstances of that request, which was based on the impact of Hurricane Sandy on counsel's office and practice, The Government did not object to that request, which was based on the impact of Hurricane Sandy on counsel's office and practice, and this Court continued the case to January 22, 2013.

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Robert L. Jenkins, Jr., Esq.
Rjenkins@BynumAndJenkinsLaw.com

Alan Dexter Bowman, Esq.
Alanbowman.lawoffice@gmail.com

/s/

Michael P. Ben'Ary
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Phone: (703) 299-3700
Facsimile: (703) 837-8242
michael.ben'ary2@usdoj.gov